

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

MARY HOLMES, DENISE DAVIS,
ANDREW DALLAS, and EMPOWER
MISSOURI,

Plaintiffs,

No. 2:22-CV-04026

-against-

ROBERT KNODELL, in his official capacity
as Acting Director of the Missouri Department
of Social Services,

Defendant.

PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Plaintiffs seek the Court's permission to exceed the page limit set by Local Rules, and in support thereof, Plaintiffs respectfully state:

1. Pursuant to Local Rule 7.0(d)(1)(A), suggestions filed in support of a motion cannot exceed 15 pages without the permission of this Court.
2. Having conducted comprehensive discovery in this matter, Plaintiffs believe no material facts are in dispute, and that this action can be resolved via summary judgment. Plaintiffs thus intend to file a motion for summary judgment and suggestions in support thereof.
3. Plaintiffs have asserted four separate legal claims, alleging that their rights under the federal Supplemental Nutrition Assistance Program (SNAP) statute, to constitutional due process, and under the Americans with Disabilities Act have been violated.

4. In order to effectively describe the extensive relevant evidence gathered in discovery, explain how this evidence establishes violations of their federal civil rights, and demonstrate their entitlement to declaratory and injunctive relief, Plaintiffs must file a brief that exceeds the 15-page limit.

5. Plaintiffs believe full and thorough briefing of the merits of this case will greatly assist the Court in understanding and resolving these issues expeditiously.

6. Plaintiffs have already made significant efforts to reduce the length of their memorandum in support of their motion for summary judgment, and will continue to edit their filing to ensure it is as concise as possible. Plaintiffs nonetheless expect their filing—excluding pages pursuant to Local Rule 7(d)(2)—could be as long as 45 pages.

For the forgoing reasons, Plaintiffs respectfully request that the Court grant them leave to exceed the page limit set by local rules so that they may file suggestions in support of their motion for summary judgment that exceed 15 pages.

Respectfully submitted,

/s/ Lisa J. D'Souza

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